

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2019-262-E

| | | |
|--|---|------------------------------|
| IN THE MATTER OF: |) | |
| |) | |
| Application of Duke Energy Progress, LLC |) | PETITION TO INTERVENE |
| for Approval of Rider DSM/EE-11, Decreasing |) | BY NUCOR STEEL – |
| Residential Rates and Increasing Non-Residential |) | SOUTH CAROLINA |
| Rates |) | |
| |) | |

Nucor Steel-South Carolina (“Nucor”), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the Public Service Commission of South Carolina (“Commission”), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC (“DEP”), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor’s manufacturing process, electric costs directly affect Nucor’s ability to continue to produce steel at a competitive price.
2. This docket will consider DEP’s application for approval of Rider DSM/EE-11, which will recover certain costs and revenue associated with DEP’s demand side management and energy efficiency programs. As a large industrial customer of DEP, Nucor has a stake in, and may be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing

established in this proceeding. Since 1987, Nucor has actively participated in many previous before this Commission.

3. Nucor's mailing address is:

Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

4. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

A handwritten signature in black ink, appearing to read "Rob Smith II", written in a cursive style.

Robert R. Smith II

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Counsel for Nucor Steel – South Carolina

Dated: August 28, 2019

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This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail or electronic mail on this the 28th day of August, 2019:

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